IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

NATHANIEL SPRIGGS, :

Plaintiff,

•

v. : Docket No. 22-CV-01474

:

CITY OF HARRISBURG and : MAYOR WANDA WILLIAMS, :

.

Defendants. :

DEFENDANT, MAYOR WANDA WILLIAMS' MOTION FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56, Defendant, Mayor Wanda Williams, by and through her undersigned counsel, MacMain Leinhauser PC, respectfully moves for summary judgment in her favor and against Plaintiff, Nathaniel Spriggs, on the basis of the facts and authorities set forth in the accompanying Statement of Undisputed Material Facts and Memorandum of Law in Support, which are incorporated by reference at length herein. There is no genuine issue of material fact with respect to Count I and Count III of Plaintiff's Second Amended Complaint (ECF Doc. No. 38), and Mayor Williams is entitled to judgment as a matter of law on all counts.

WHEREFORE, Defendant, Mayor Wanda Williams respectfully requests

This Honorable Court enter an Order granting summary judgment in her favor and against Plaintiff, Nathaniel Spriggs, with prejudice, in accordance with Federal Rule of Civil Procedure 56.

Respectfully submitted,

MacMAIN LEINHAUSER PC

Date: January 6, 2025 By: /s/ David J. MacMain

David J. MacMain Laurie A. Fiore

PA Attorney I.D. Nos. 59320 / 81373

433 W. Market Street, Suite 200

West Chester, PA 19382

O: 484-318-7106

DMacMain@macmainlaw.com

LFiore@macmainlaw.com

Attorneys for Defendant, Mayor

Wanda Williams